

EXHIBIT 1

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<p>515</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF VIRGINIA 3 RICHMOND DIVISION</p> <p>4 ----- 5 ePLUS, INC., : 6 : 7 Plaintiff, : 8 v. : Civil Action 9 : No. 3:09CV620 10 LAWSON SOFTWARE, INC., : 11 : January 6, 2011 12 Defendant. : 13 -----</p> <p>14 COMPLETE TRANSCRIPT OF JURY TRIAL 15 BEFORE THE HONORABLE ROBERT E. PAYNE 16 UNITED STATES DISTRICT JUDGE, AND A JURY</p> <p>17 APPEARANCES: 18 Scott L. Robertson, Esq. 19 Jennifer A. Albert, Esq. 20 Michael T. Strapp, Esq. 21 David M. Young, Esq. 22 GOODWIN PROCTOR 23 901 New York Avenue, NW 24 Washington, D.C. 20001 25 Craig T. Merritt, Esq. CHRISTIAN & BARTON 909 E. Main Street, Suite 1200 Richmond, VA 23219-3095</p> <p>Counsel for the plaintiff ePlus</p> <p>DIANE J. DAFFRON, RPR OFFICIAL COURT REPORTER UNITED STATES DISTRICT COURT</p>	<p>517</p> <p>1 (The proceedings in this matter commenced at 2 9:20 a.m.)</p> <p>3 THE CLERK: Civil Action No. 3:09CV00620, 4 ePlus, Incorporated v. Lawson Software, Incorporated. 5 Mr. Scott L. Robertson, Mr. Craig T. Merritt, 6 Ms. Jennifer A. Albert, Mr. Michael T. Strapp, and Mr. 7 David M. Young represent the plaintiff. 8 Mr. Daniel W. McDaniel, Mr. Dabney J. Carr, 9 IV, Ms. Kirstin L. Stoll-DeBell, and Mr. William D. 10 Schultz represent the defendant. 11 Are counsel ready to proceed? 12 MR. ROBERTSON: Yes, Your Honor. 13 MR. McDONALD: Yes, Your Honor. 14 THE COURT: All right. Thank you very much. 15 I apologize for keeping you-all waiting this 16 morning. I had a mechanical malfunction that I needed 17 to attend to, and I'm not very mechanically oriented. 18 All right, Mr. Robertson. 19 Dr. Weaver, I remind you you're under the 20 same oath which you took yesterday. 21 THE WITNESS: Yes, Your Honor. 22 BY MR. ROBERTSON: (Continuing) 23 Q Good morning, Dr. Weaver. 24 A Good morning. 25 Q If we could have Plaintiff's Exhibit No. 1 back up</p>
<p>516</p> <p>1 APPEARANCES: (Continuing) 2 Daniel W. McDonald, Esq. 3 Kirstin L. Stoll-DeBell, Esq. 4 William D. Schultz, Esq. 5 MERCHANT & GOULD 6 3200 IDS Center 7 80 South Eighth Street 8 Minneapolis, MN 55402-2215 9 Dabney J. Carr, IV, Esq. 10 TROUTMAN SANDERS 11 Troutman Sanders Building 12 1001 Haxall Point 13 P.O. Box 1122 14 Richmond, VA 23218-1122 15 16 Counsel for the defendant Lawson Software.</p>	<p>518</p> <p>1 on the screen again, the '683 patent, the cover page 2 here. 3 Dr. Weaver, the jurors have seen this exhibit now 4 several times and it's in their jury notebooks. This 5 is at tab 2. Can you just tell us what is the title 6 of the patent? 7 A Electronic Sourcing System and Method. 8 Q Has the Court defined the term "electronic 9 sourcing system"? 10 A Yes, it has. 11 Q What's your understanding as to what that 12 construction is? 13 A In the glossary of claim terms, the "electronic 14 sourcing system" has been defined by the Court to be 15 an electronic system for use by a prospective buyer to 16 locate and find items to purchase from sources, 17 suppliers or vendors. 18 Q What is your understanding of what a source is, 19 sir? 20 A A source would be a vendor or a manufacturer or a 21 distributor. 22 Q In the Court's construction of the claim term 23 "catalog" or "product catalog," how does the Court 24 define what a vendor can be? 25 A The vendor, in the Court's construction, a vendor</p>

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<p>631</p> <p>1 A Yes, you can.</p> <p>2 Q Now that we've gone through some of the various -- and</p> <p>3 overviewed some of the various different Lawson Software</p> <p>4 modules that can be used to implement these electronic</p> <p>5 procurement systems, do you have any demonstrations that you'd</p> <p>6 like to do to show the Lawson system in operation?</p> <p>7 A First demonstration would show the category search</p> <p>8 feature.</p> <p>9 Q And you have this, these demonstrations, as I understand,</p> <p>10 both in captured screen shots -- is that right -- captured</p> <p>11 software and also in hard copies?</p> <p>12 A That's right.</p> <p>13 MR. ROBERTSON: Your Honor, I'm going to be offering</p> <p>14 both those for ease of review at the appropriate time.</p> <p>15 Q How were you able to capture a demonstration of the system</p> <p>16 using the Lawson Software?</p> <p>17 A So Lawson provided a demonstration system that included</p> <p>18 these modules that we've been talking about, and it runs on a</p> <p>19 laptop. So we used -- we practiced to get the demo correct in</p> <p>20 the sense that it showed what I wanted it to show, and then we</p> <p>21 used software that was present on the machine that we were</p> <p>22 given that did a realtime recording of whatever was on the</p> <p>23 screen. So it's a realtime movie capture.</p> <p>24 Q Who provided that software?</p> <p>25 A That was provided by Lawson on the machine we got. So as</p>	<p>633</p> <p>1 A Yes, I'm aware of that.</p> <p>2 Q And what was your understanding as to what the outcome of</p> <p>3 that was when the requests were made?</p> <p>4 A Well, I don't know the details. What I know is that</p> <p>5 eventually a Lawson consultant was hired to help load some</p> <p>6 additional data. Even so, three of the demonstrations that I'm</p> <p>7 going to give were on the system as provided by Lawson. Only</p> <p>8 one needed additional data loaded.</p> <p>9 Q And a Lawson employee or personnel worked with ePlus</p> <p>10 personnel to help them load additional data -- excuse me.</p> <p>11 Worked with ePlus's counsel to load additional data on this</p> <p>12 laptop for that one presentation?</p> <p>13 A That's my understanding.</p> <p>14 Q Now, based on the documents you've reviewed and based on</p> <p>15 testimony reviewed, do these Lawson accused procurement systems</p> <p>16 typically come with lots of item data?</p> <p>17 A Well, when the database is loaded, the witnesses said that</p> <p>18 there are typically hundreds of catalogs and thousands,</p> <p>19 sometimes tens of thousands of items.</p> <p>20 Q So with that kind of robust data in the database, it's</p> <p>21 easier to show the full functionality of the system; is that</p> <p>22 fair to say?</p> <p>23 A That's fair to say. However, we're going to do it.</p> <p>24 Q All right. Then as I understand it, three of the four</p> <p>25 demonstrations were just as the laptop was provided to counsel</p>
<p>632</p> <p>1 we did these demonstrations, we used that Lawson-provided</p> <p>2 software to create a realtime movie which we saved and which</p> <p>3 now we're going to play back.</p> <p>4 Q Did that laptop come with item data?</p> <p>5 A Well, it came with some item data which turns out to be an</p> <p>6 issue. The database that we were provided from Lawson was</p> <p>7 actually pretty sparse, so, yes, it had some items in there,</p> <p>8 but it wasn't fleshed out like a production system would be.</p> <p>9 Q In order to demonstrate some of the capabilities and</p> <p>10 functionality of, say, comparison shopping or using the UNSPSC</p> <p>11 codes to identify goods that are similar, identical, or</p> <p>12 generally equivalent, do you need data, item data in the</p> <p>13 database to demonstrate that?</p> <p>14 A Absolutely.</p> <p>15 Q And if you don't have, for example, a sufficient number of</p> <p>16 black pens to compare, or if you have only have one black pen</p> <p>17 and you're searching for black pens, can you demonstrate some</p> <p>18 of the functionality of the system if that item data is not</p> <p>19 there?</p> <p>20 A That's right. Without equivalent items, there are no</p> <p>21 equivalent items to be found.</p> <p>22 Q So were you aware that a request was made to Lawson to</p> <p>23 provide additional data on this demonstration laptop that they</p> <p>24 gave us so that we could demonstrate the functionality of the</p> <p>25 system?</p>	<p>634</p> <p>1 for ePlus?</p> <p>2 A Yeah. We could say out of the box, the box being the</p> <p>3 laptop.</p> <p>4 Q One being with the additional data that Lawson assisted</p> <p>5 ePlus's counsel in loading; is that right?</p> <p>6 A That's correct.</p> <p>7 Q The first demonstration you have, what do you want to</p> <p>8 illustrate?</p> <p>9 A I want to illustrate the category search in which we can</p> <p>10 find generally equivalent items and then we can find other</p> <p>11 items and build a requisition, and then we can build one or</p> <p>12 more purchase orders from that requisition.</p> <p>13 Q Okay. And did you direct the preparation of this</p> <p>14 demonstration?</p> <p>15 A Yes, I did.</p> <p>16 Q All right. If we can, before we do that, just so we can</p> <p>17 orient the jury as to what they're going to see, can we see</p> <p>18 claim three and claim 28 side by side on the screen?</p> <p>19 Now, both these claims, claim three being the system claim</p> <p>20 and claim 28 being a method claim, has this element concerning</p> <p>21 converting data relating to a selected matching item and</p> <p>22 associated source to data relating to an item in a different</p> <p>23 source; do you see that?</p> <p>24 A Yes. That's the sixth element.</p> <p>25 Q The Judge has construed both these claim terms; correct?</p>

<p>635</p> <p>1 A Yes.</p> <p>2 Q And I'm not going to go through it again because we read</p> <p>3 them at one point, but the jury has them in their glossary.</p> <p>4 And, of course, all the other elements need to be there as</p> <p>5 well. Are we going to be seeing, as we walk through this</p> <p>6 demonstration, the existence of these other elements that you</p> <p>7 described?</p> <p>8 A Yes.</p> <p>9 Q Why don't you go ahead.</p> <p>10 A All right. So Mike is going to play this movie, and</p> <p>11 you'll see there are some waits involved in here, but that's</p> <p>12 just because it's recording exactly what was seen.</p> <p>13 Q Stop here for a second and let me ask you a question here.</p> <p>14 There's a box in the lower right-hand corner. Is that part of</p> <p>15 the Lawson system or not part of the Lawson system?</p> <p>16 A That was part of the system provided, and it's part of the</p> <p>17 realtime capturing software, so you can -- what's showing --</p> <p>18 can you see this? So what you are seeing right now is a clock</p> <p>19 that says we're 12.4 seconds into the movie, and then there's a</p> <p>20 button that if you were on the real laptop, you could click it</p> <p>21 and it would toggle from pause to play to pause to play. We've</p> <p>22 chosen just to let it play.</p> <p>23 Q If we wanted to --</p> <p>24 MR. McDONALD: Your Honor, could I get a</p> <p>25 clarification on which exhibit, and is there a paper version of</p>	<p>637</p> <p>1 A Sure. Exactly. So I'm going to go down and click on</p> <p>2 Lawson portal. Continue. Now, this is one of those waits.</p> <p>3 Okay. We get to the Lawson log-in screen. So we put in the</p> <p>4 user name and password and then click on log in. This will be</p> <p>5 one of those longer waits. You can see the time clicking away</p> <p>6 in the bottom right-hand corner.</p> <p>7 Stop. So now we are at the Lawson home page, and if you</p> <p>8 are familiar with browsers, you see up here, there is the URL</p> <p>9 that we're using. LSF server, that's Lawson server foundation,</p> <p>10 that's what we talked about before. Server.corpnet.lawson.com.</p> <p>11 So we're looking at the portal.</p> <p>12 Q All right, you used the term URL. Can you explain to the</p> <p>13 jurors what you mean by that?</p> <p>14 A Falling back into my vernacular. Universal resource</p> <p>15 locator, so commonly called a web address. Okay, so we can</p> <p>16 continue. Top. Stop. That was stop, not top. Here's another</p> <p>17 one of those drop-down menus. So on the left-hand side, I have</p> <p>18 a menu. One of the top level choices was requisition self</p> <p>19 service. So I'm going into the RSS module, and I'm picking one</p> <p>20 of the activities that is there. This is one of the</p> <p>21 capabilities. All right, so I'm going to click on the shopping</p> <p>22 selection. Continue.</p> <p>23 Stop. So, now we come to the shopping screen. Again, if</p> <p>24 you look up here at the top, you will see there are some</p> <p>25 choices that can be made. These are, again, top levels of what</p>
<p>636</p> <p>1 this one so we know what you are using?</p> <p>2 MR. ROBERTSON: It's going to be Plaintiff's</p> <p>3 Exhibit 376 is the video, and Plaintiff's Exhibit 374 would be</p> <p>4 the hard copy paper capture of the screen shots.</p> <p>5 Q So we're clear, this is like the video playback? We can</p> <p>6 do the stop, forward, reverse by using these tools if we need</p> <p>7 to go back at any time?</p> <p>8 A Well, these tools are for the original capture. Mike and</p> <p>9 I are going to do it manually. I'm going to say stop and</p> <p>10 continue and probably say go back.</p> <p>11 Q We may have to go back because it moves quickly sometimes?</p> <p>12 A Sometimes it's too quick, and sometimes it's too slow.</p> <p>13 Right now we're going to start with a go back, so go back to</p> <p>14 the beginning.</p> <p>15 All right, so as the laptop screen exists, first I'm going</p> <p>16 to bring up the browser. I'm going to use Internet Explorer,</p> <p>17 so here we go. Stop. Now, again, I'm just going to tell you,</p> <p>18 you're going to see some times when not much is happening, but</p> <p>19 this is just a true-to-life recording of exactly what was on</p> <p>20 the screen at the time.</p> <p>21 Okay, so in your ordinary Internet Explorer browser, I've</p> <p>22 clicked on the favorites tab, and one of the favorites that</p> <p>23 I've saved is the Lawson portal.</p> <p>24 Q Is this an example of the drop-down menu you were talking</p> <p>25 about earlier?</p>	<p>638</p> <p>1 will be drop-down menus. I'm going to go click on this</p> <p>2 find/shop, and that's going to give me additional choices.</p> <p>3 Continue.</p> <p>4 Stop. So here are the choices. I can search the</p> <p>5 catalogs, I can do a Punchout. I'm going to do that later.</p> <p>6 Down there at the bottom is categories. So I'm going to go</p> <p>7 down and click on categories, because I want to do a category</p> <p>8 search. Continue.</p> <p>9 Stop. Now, remember with the UNSPSC codes, we said that</p> <p>10 there were four levels: Segment, family, class, and commodity.</p> <p>11 So what is showing here in the category tab, the category</p> <p>12 window, is the first three of a small set of these top level</p> <p>13 categories, these segment categories. So, remember, there</p> <p>14 could have been a hundred of them, 00 to 99, but here, for</p> <p>15 clarity, everyone exchanges those digits for names so that they</p> <p>16 have -- they make sense to humans.</p> <p>17 So my top choice there, live plant and animal material and</p> <p>18 accessories and supplies, that's one of the segment codes.</p> <p>19 Now, I don't know what code it is, 23, 99, I don't know. It</p> <p>20 doesn't matter. It is representative of what is in this very</p> <p>21 broad segment. So I'm going to scroll down and show you the</p> <p>22 others, and then I'm going to come back and pick one in the</p> <p>23 middle. Continue. See, we only had about six there. Stop.</p> <p>24 Q Let me ask you a question about that then. There are only</p> <p>25 six here to illustrate the functionality of it. Does the</p>

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<p>639</p> <p>1 Lawson requisition self service you are using here have the</p> <p>2 capability to have more?</p> <p>3 A Absolutely.</p> <p>4 Q How many could it have?</p> <p>5 A It could be a hundred different segments. Each of those</p> <p>6 segments could have a hundred families. They could each have a</p> <p>7 hundred classes. They could each have a hundred commodities.</p> <p>8 Q I noticed you clicked on one of these segments?</p> <p>9 A The one I clicked there in the middle is communications</p> <p>10 and computer equipment and peripherals and components and</p> <p>11 supplies. So you can see how broad a category that segment</p> <p>12 name represents. So what we're going to do now is drill down</p> <p>13 to become finer-grained.</p> <p>14 So having clicked on that top level segment -- continue --</p> <p>15 stop. So underneath the segment is the family. Now, here we</p> <p>16 show that there's very little data in the system we were</p> <p>17 provided. Whereas there could be a hundred different family</p> <p>18 names, there's only one. So due to the paucity of data here,</p> <p>19 I'm going to click the only possibility I've got.</p> <p>20 All right, so I've done the segment. This is the family.</p> <p>21 I'm going to click on the family name, hardware and</p> <p>22 accessories. Continue.</p> <p>23 Stop. So now we're down to the class. There could have</p> <p>24 been a hundred classes, but, again, because there's so little</p> <p>25 data here, there's only two. So as I look at the class, I have</p>	<p>641</p> <p>1 All right, so I'm going to look at these two computers.</p> <p>2 You can see the first line item there is an IBM ThinkPad, and</p> <p>3 it has an item number of 6001. The one below it is a Dell</p> <p>4 Inspiron 8000. It has an item number of 6020. So I'm going to</p> <p>5 go click on the item number, and that's going to get us a</p> <p>6 description of this item.</p> <p>7 Q Before you do that, Doctor, does it have unit measure</p> <p>8 category?</p> <p>9 A Right. Under UOM, you see each.</p> <p>10 Q Does it have cost information?</p> <p>11 A Under cost, the ThinkPad is 2,500. The Dell is 2,000.</p> <p>12 Q Does it have description of the item?</p> <p>13 A It has a description, IBM ThinkPad T20 or Dell Inspiron</p> <p>14 8000 with Intel Pentium processors.</p> <p>15 Q You indicated it had an item number?</p> <p>16 A There is an item number.</p> <p>17 Q And it even provides for the Intel Pentium or the Dell</p> <p>18 Inspiron, the manufacturer?</p> <p>19 A I just covered up the description. Yeah. So not only do</p> <p>20 we have in this case the name of the computer, Dell Inspiron</p> <p>21 8000, we also have a little more descriptive information, that</p> <p>22 it's an Intel Pentium III processor.</p> <p>23 Okay. We'll continue. Oh, and stop. I should also note</p> <p>24 while we're here that over here is the Dell shopping cart, and</p> <p>25 it's obviously empty. It's supposed to be empty --</p>
<p>640</p> <p>1 a choice of computers or monitors and displays. So I'm going</p> <p>2 to go for computers. Continue.</p> <p>3 Stop. Now I'm down to the commodity level. The</p> <p>4 commodities, there should be a lot of them, but because of the</p> <p>5 paucity of data here, we have only one commodity category,</p> <p>6 notebook computers. So I'll click the only choice I've got,</p> <p>7 and then that will list the actual item data that is underneath</p> <p>8 the notebook computers commodity code. Continue.</p> <p>9 Stop. So now we see all of the items in the database that</p> <p>10 have the UNSPSC code for notebook computers, and there's only</p> <p>11 two, okay? Small database.</p> <p>12 Q So I understand, for the segments, there could have been</p> <p>13 thousands, for families there have been --</p> <p>14 A Hundreds.</p> <p>15 Q Hundreds. What is the next level?</p> <p>16 A So you start with segment.</p> <p>17 Q Class?</p> <p>18 A Could be a hundred. Then family -- each of those segments</p> <p>19 could have a hundred, and then each of those families could</p> <p>20 have a hundred classes, and each of the classes could have a</p> <p>21 hundred commodities.</p> <p>22 Q Those commodities, you could have thousands of items?</p> <p>23 A Right. Once you get down to the commodity level, you have</p> <p>24 unlimited number of items that map to that code. Here we have</p> <p>25 two. Okay, it's going to do the job, though.</p>	<p>642</p> <p>1 Q I think you misspoke. I think you said the Dell shopping</p> <p>2 cart.</p> <p>3 A I misspoke. This is the Lawson shopping cart right here</p> <p>4 where it says my cart. And so as I select items, they will</p> <p>5 show up in the shopping cart, but we'll see that. All right,</p> <p>6 so now I'm READY to drill down on the ThinkPad. Continue.</p> <p>7 So I click on that item number. Stop. And this retrieves</p> <p>8 the data in the item master and vendor item table database and</p> <p>9 tells me about the item. So we have an item number, we have a</p> <p>10 description, a unit of measure, a cost.</p> <p>11 We have a source vendor ID, 118, and a source vendor name,</p> <p>12 Office Max. So from observing this information that is</p> <p>13 produced, I know that this IBM ThinkPad has a vendor source of</p> <p>14 Office Max.</p> <p>15 Q Let me stop and ask a question, Doctor. There's a box</p> <p>16 there that says image not available. Does this RSS application</p> <p>17 have the ability to load images of the items offered for sale?</p> <p>18 A It does, and the documentation encourages one to do so.</p> <p>19 But, again, because of the paucity of data, we didn't have any</p> <p>20 item images in the data we were given.</p> <p>21 Q This is how it was provided to us; it could have been</p> <p>22 provided with an image, because the software permits you to do</p> <p>23 that?</p> <p>24 A Right. It could have been chock-full of images, but it</p> <p>25 wasn't. Okay, so I'm going to scroll down and up so you see</p>

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<p>643</p> <p>1 all of the information that was presented to me as the user of 2 the RSS system, and then we'll go back and look at the other 3 Dell computer. So continue. So now I'm going to add that to 4 the cart. 5 Stop. So here in the Lawson shopping cart, I have my IBM 6 ThinkPad T20, item number 6001; quantity, one; unit of measure, 7 each; cost, \$2,500. So I'm going to park this item in the 8 shopping cart, but then I'm going to go back and look at the 9 equivalent items, equivalent in that they had the same UNSPSC 10 code. 11 All right, so we'll continue, and I'll click on this back 12 button over here. So here -- stop. Here is that second line 13 item as we saw before, the Dell Inspiron. So I'm clicking on 14 its item number, and we'll drill down on that and see what 15 information is provided there. Continue. 16 Stop. So similarly to what we saw before, this is the 17 other machine. It's an item -- I wiped it out. Item 6020, a 18 Dell Inspiron 8000 with Pentium III processor, a unit of 19 measure each, and a cost of 2,000. But it has a source vendor, 20 ID code of 124, and a source vendor name of Diablo. 21 So the first computer, the ThinkPad was coming from the 22 Office Max catalog. This is coming from the Diablo catalog. 23 So I stare at that, and I think which of these machines is a 24 better choice for me. I'm cheap, so I'm going to go with this 25 one. So I will add this one to the shopping cart, Lawson</p>	<p>645</p> <p>1 equipment. Stop. Oh, I might also note that the hierarchy 2 tree is being kept for me up here at the top. Here's my 3 segment level, here's my family level. As soon as I click here 4 on my class level, it will appear here and so on. 5 All right, so I'm about to click on laboratory, 6 environmental conditioning equipment for my third category. 7 Continue. 8 Stop. Okay, now, again, we're down to commodities. There 9 could be a hundred of these, but there's not. There's just 10 one. There's one commodity called glove boxes. So when I 11 click on this, I will see all the items in the item master 12 database and the vendor item table that have been encoded with 13 the UNSPSC code for glove boxes. Continue. 14 Stop. Once again, the database is small, so there's only 15 two entries under the commodity heading. Both of these are 16 boxes of sterile surgical gloves, so I'm going to pick one and 17 add that to my Lawson shopping cart. Continue. I'm going to 18 look at it first. Smart shopper. 19 Stop. All right. So I just did a drill-down as I did 20 with the computers. So you see we have an item number, 1036, 21 we have a description, gloves, sterile surgical, size seven. A 22 unit of measure. Here it's case, cost, 400 bucks, source 23 vendor. The ID number is 117, and the source vendor name is 24 Baxter Healthcare. 25 Continue. So scroll down and back up, and add that to my</p>
<p>644</p> <p>1 shopping cart, and delete the other one. So continue. 2 Okay, now stop. So now I have both notebook computers in 3 the Lawson shopping cart, and I'm going to go up here to this X 4 and delete the ThinkPad. Continue. 5 And like all good software, it asks me, do you really want 6 to delete that, and I say, yes. Okay. Stop. So at this 7 point, I have done the UNSPSC code, found two generally 8 equivalent notebook computers, chose one, added it to the 9 shopping cart, added the other one to the shopping cart, 10 deleted the first one. 11 So I've been able to convert one item from one source, the 12 ThinkPad from Office Max, into an equivalent item from another 13 source, the Dell Inspiron here, and having done that, I'm now 14 going to go back and pick another category and find another 15 item to add so that I'll have multiple items in my shopping 16 cart. 17 Okay, so I'm backed out -- because I did that drop-down 18 menu to categories, I'm back at the highest level, the segment 19 level. So continue. Scroll down. Stop. So this time my 20 segment level is laboratory and measuring and observing and 21 testing equipment. Continue. Stop. My family, again, there's 22 only two here, laboratory and scientific equipment, or 23 measuring or observing, or testing instruments and accessories. 24 Continue. 25 So I pick at my family, laboratory and scientific</p>	<p>646</p> <p>1 shopping cart. So here it is, gloves at the top, Dell computer 2 at the bottom. Now stop. I have finished shopping, so I have 3 the information from the database now in the shopping cart. My 4 next goal is to create a requisition. Then I'll need to get 5 that approved, and then I'll need to get that turned into 6 purchase orders. 7 So since the gloves and the Dell came from different 8 vendors, I will need two POs, one to each of those vendors, so 9 I'm going to click on checkout. Continue. All right, saved. 10 Stop. So it gives it a number, 911. So when I come into 11 this system next, I'm going to come in as a manager, and I'm 12 going to look for this order 911 that is existing in the 13 system. I'm going to find it among all other orders, and then 14 I'm going to get it approved. All right, continue. Status 15 needs approval. 16 All right, back to the portal home page, and now I'm going 17 to come in as a manager. Here are some requisitions, but 911 18 is not among them. Stop. Here is the requisition 911, and 19 that's the one I need to have approved. Continue. 20 Stop. So here we pull up the requisition, you see right 21 there, and we have the two line items, the Dell Inspiron and 22 the case of gloves. So I've logged in now as the manager when 23 I clicked on manager, and so here are the actions I can take: 24 Approve, reject, or unrelease, so I'm going to approve these. 25 Continue.</p>

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<p>647</p> <p>1 Okay, approve, approve action to be taken. Okay. Work</p> <p>2 object. Taken, all right. Stop. So at this point, it looks</p> <p>3 like -- superficially it looks like I'm done. It looks like</p> <p>4 I've got it approved, but in this particular example, there</p> <p>5 were additional business logic rules that said, aha, you have a</p> <p>6 computer in there. That's a technical thing, so you need</p> <p>7 technical approval in addition to manager's approval. Okay,</p> <p>8 we'll go get that, too, so back I go as a manager. Continue.</p> <p>9 Approve technical items, find 911. There it is. Stop.</p> <p>10 And so now what I'm going to be approving is the fact that it's</p> <p>11 got a computer in there. Continue.</p> <p>12 Stop. While we're here, we may as well show, to show that</p> <p>13 I'm doing the technical approval, we have this item detailed</p> <p>14 down here that says it's the Dell computer from Diablo that I'm</p> <p>15 approving. So I go back up to approve it.</p> <p>16 Q Let me stop you for a second, Doctor, and ask you, we've</p> <p>17 been seeing a number -- some of the features that we're going</p> <p>18 to be talking about in the claims that were necessary about the</p> <p>19 product catalog and selecting product catalogs and doing</p> <p>20 comparison shopping using UNSPSC codes.</p> <p>21 MR. McDONALD: I object to the form, Your Honor.</p> <p>22 That wasn't a question.</p> <p>23 Q Let me ask this question: This approval process, is this</p> <p>24 part of the claimed elements that are being asserted here?</p> <p>25 A No.</p>	<p>649</p> <p>1 infringing. This is just how you make the system work, and</p> <p>2 then we'll see it -- turn the requisition or choose the</p> <p>3 requisition and then we'll see it.</p> <p>4 We've chosen the requisition, or have we? No, we're about</p> <p>5 to because I'm going to give it a name, and then we'll see it</p> <p>6 generate POs.</p> <p>7 So I'll call this job RQ911, give it a name, requisition</p> <p>8 number 911. Default delivery is five days. Release the</p> <p>9 purchase orders, yes. Choose an option for exception reports.</p> <p>10 There are some other boxes that are available. I don't need</p> <p>11 any of these. I'll go back to the main tab, and, okay, that's</p> <p>12 all I need to do, so I add this. And now I'm ready to submit</p> <p>13 it to the system for -- by submit, I mean turn the requisition</p> <p>14 into a PO. So I click on submit, give this a submit -- all</p> <p>15 right, and stop.</p> <p>16 Now, this process is actually running what we call in the</p> <p>17 background. The foreground is this PO 100 screen, and the</p> <p>18 program is running in the background converting the requisition</p> <p>19 to a purchase order, so when this was done in realtime, enough</p> <p>20 time had elapsed for that process to occur and for a report to</p> <p>21 be generated which is the purchase order.</p> <p>22 So what I'm going to do next is just go look at it,</p> <p>23 because it's been created. I just can't see it yet, so</p> <p>24 continue. I'm going to go up here to the print manager and</p> <p>25 click on that. Stop.</p>
<p>648</p> <p>1 Q Because there's an approval process which is an additional</p> <p>2 step or additional feature that's there beyond the claim</p> <p>3 elements, does that render a system non-infringing?</p> <p>4 A No.</p> <p>5 Q Having this approval process is irrelevant to the analysis</p> <p>6 when the jury needs to go back and determine whether or not the</p> <p>7 functionality either satisfies a system or method?</p> <p>8 A That's correct.</p> <p>9 Q Thank you.</p> <p>10 A Okay, so we're ready now to do the technical approval.</p> <p>11 Continue. So I'll click approval, approval action taken. Work</p> <p>12 object dispatched. Stop. Now, you heard me say earlier that</p> <p>13 in the purchase order module, there's a program called PO 100</p> <p>14 that turns requisitions into purchase orders. So I'm going to</p> <p>15 run that program, PO 100, and I'm going to tell it which</p> <p>16 requisition to go get. You might -- you may or may not recall</p> <p>17 that I said that information gets cached in the system and</p> <p>18 retrieved.</p> <p>19 This is retrieving the requisition data by the purchase</p> <p>20 order module, and then we'll see it generate POs. Okay, so now</p> <p>21 we're ready to run the PO 100 program. Continue.</p> <p>22 Stop. So here is the opening screen for the PO 100</p> <p>23 program. So I'm going to fill in job name and job description,</p> <p>24 I'm going to put in three pieces of information that the system</p> <p>25 requires. Here this has -- this part has nothing to do with</p>	<p>650</p> <p>1 So here this print manager keeps copies of the things it</p> <p>2 creates, and the very top one on the list is that job that I</p> <p>3 just named requisition number 911, and it was operated on by</p> <p>4 the PO 100 program. So when I go click on this, I'm going to</p> <p>5 reveal the purchase orders that have been created. Continue.</p> <p>6 Stop. So if you think of this screen and then the</p> <p>7 scroll-down menu as a big piece of paper, up here at the top we</p> <p>8 have some information like when it was run, and then here we</p> <p>9 have information that's important to a purchase order, namely</p> <p>10 who is doing the purchasing.</p> <p>11 So in this case, the buyer is the Metropolis Medical</p> <p>12 Center, and it's their -- somewhere in here it will say the</p> <p>13 delivery location is main. Well, I don't see that yet. It</p> <p>14 doesn't matter. What we're going to do now is scroll down a</p> <p>15 bit more. Okay, continue.</p> <p>16 Move from side to side, there's nothing to the right.</p> <p>17 Stop. So here is the first purchase order. Our buyer,</p> <p>18 Metropolis Medical Center, we have a vendor, 117. Baxter</p> <p>19 Healthcare is that vendor. We have an item number 1036. We</p> <p>20 have a description, sterile surgical gloves, size seven. Its</p> <p>21 source document was requisition 911. Quantity is one. Unit of</p> <p>22 measure is a case, and here's what I was looking for. The</p> <p>23 requesting location is main. And then here, the PO has been</p> <p>24 released. So this system has created the purchase order and</p> <p>25 released it.</p>

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<p>651</p> <p>1 Now, that's the first of two. So now I'm going to scroll 2 down some more. Continue. Stop. And here's the second PO. 3 So it's at the bottom of this conceptual sheet of paper. So, 4 again, we have the buyer, Metropolis. We have a vendor, number 5 124 from Diablo. The item number is 6020. The item 6 description is the Dell Inspiron 8000. It came from the 911 7 requisition. I'm ordering one of them in unit of measure each, 8 and I'm delivering it to main. 9 Now, here, for the second PO, it has been released. So 10 two POs have been created and released, and the report 11 summarizes two POs created. That's the end. 12 Q Thank you. Now, Doctor we're going to be going through 13 some more documents, and we have three more demonstrations to 14 sort of illustrate the functionality of this accused system. 15 And at some point, I'm going to be asking you to go through all 16 12 of these asserted claims for each element under the Court's 17 claim construction. Are you going to be able to do that for 18 me? 19 A Sure. 20 Q At this point, just keeping the Court's claim terms in 21 mind, let me just ask you, at a high level with respect to this 22 demonstration we just saw, and keeping the claim three and 23 claim 28 we talked about which include that element for 24 converting, did we see at least two product catalogs? 25 A Yes, we did.</p>	<p>653</p> <p>1 Q And were you able, using the UNSPSC, to find items that 2 were similar, generally equivalent? 3 A Yes, I converted that ThinkPad into a Dell. 4 Q Thank you. Doctor, I'd like you to take a look at 5 Plaintiff's Exhibit 280, and can you identify what this 6 document is? 7 A This is the Lawson Software response to Presbyterian 8 Healthcare Services. 9 Q So this is another one of those responses to an RFP? 10 A That's correct. 11 Q And what is it dated? 12 A March 22nd, 2005. 13 Q And if you could take a look at the page that begins with 14 barcode 196, if you would, sir. And here -- which has a Bates 15 number that ends 848. 16 A Yes, I'm there. 17 Q And here Presbyterian Hospital, in this -- here Lawson, in 18 this response to the request for proposal from the Presbyterian 19 Healthcare Services, is ask asking about requisitioning 20 capability from Lawson; is that right? 21 A Yes. That's exactly what it says. 22 Q And it says in the requisitioning capability, it's asking 23 to describe your ordering tools for various types of items, 24 stock, nonstock, and non-catalogs; do you see that? 25 A Mike, it is below there. There it is.</p>
<p>652</p> <p>1 Q Did we see the ability to select those product catalogs to 2 search? 3 A We did that through the categories. 4 Q Tell me what two product catalogs we saw? 5 A Office Max and Baxter Healthcare. 6 Q Did we also see Dell and Diablo? 7 A Yeah, that's right, we did. 8 Q And was there an ability to select the product catalogs? 9 A Yes, we did it through the categories. 10 Q Was there an ability to search for matching items in those 11 product catalogs? 12 A We did that. 13 Q How did we do that? 14 A We put in the -- we did the category search by marching 15 through the UNSPSC codes, picking a commodity and then picking 16 items. 17 Q Once you had selected those items from the office, from 18 the shopping cart, were you able to put them into a 19 requisition? 20 A Yes. 21 Q And did you -- were you able, from that requisition, after 22 you got the appropriate approvals which are not part of the 23 claims of the -- elements of claim, excuse me, were you able to 24 generate one or more purchase orders from that requisition? 25 A Yes, we did.</p>	<p>654</p> <p>1 Q Okay. And the response, is that on the next page? 2 A That's on the next page. 3 Q Let me -- okay, let's go to the next page. And in 4 response to this RFP, this Lawson requisition, is that one of 5 the modules that you've been describing today? 6 A It is. 7 Q What does it say that the capability is of Lawson 8 requisitions that Lawson is representing to the Presbyterian 9 Healthcare Services? 10 A That first paragraph says, Lawson requisitions enables 11 users to view online catalogs for stock and nonstock items, 12 select items from the catalog or a template, and add additional 13 comments to their requisitions. 14 Also, requesters can add non-catalog items such as service 15 or specials through item free form input. Additionally, 16 requester can view all previously created requisitions and 17 status with requisition inquiry. 18 So this tells us that the users can view online catalogs, 19 they can select items, and they can prepare requisitions. 20 Q And this is using that requisitions module that you 21 described; is that right? 22 A It is. 23 Q Let me ask you, there's an additional question on this 24 page where Presbyterian Healthcare Services asks Lawson to 25 quote, describe your system's ability to establish global</p>

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<p>741</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF VIRGINIA 3 RICHMOND DIVISION 4 5 ----- 6 ePLUS, INC. : Civil Action No. : 3:09CV620 7 vs. : : 8 LAWSON SOFTWARE, INC. : January 7, 2011 : 9 ----- 10 11 COMPLETE TRANSCRIPT OF THE JURY TRIAL 12 BEFORE THE HONORABLE ROBERT E. PAYNE 13 UNITED STATES DISTRICT JUDGE, AND A JURY 14 15 APPEARANCES: 16 Scott L. Robertson, Esquire 17 Michael G. Strapp, Esquire 18 Jennifer A. Albert, Esquire 19 David M. Young, Esquire 20 Goodwin Procter, LLP 21 901 New York Avenue NW 22 Suite 900 23 Washington, D.C. 20001 24 Craig T. Merritt, Esquire 25 Christian & Barton, LLP 909 East Main Street Suite 1200 Richmond, Virginia 23219-3095 Counsel for the plaintiff Peppy Peterson, RPR Official Court Reporter United States District Court</p>	<p>743</p> <p>1 PROCEEDINGS 2 3 THE CLERK: Civil action number 3:09CV620, ePlus, 4 Incorporated, versus Lawson Software, Incorporated. Mr. Scott 5 L. Robertson, Mr. Craig T. Merritt, Ms. Jennifer A. Albert, Mr. 6 Michael G. Strapp, and Mr. David Young represent the plaintiff. 7 Mr. Daniel W. McDonald, Mr. Dabney J. Carr, IV, Ms. 8 Kirstin L. Stoll-DeBell, and Mr. William D. Schultz represent 9 the defendant. Are counsel ready to proceed? 10 MR. ROBERTSON: Yes, Your Honor. 11 MR. McDONALD: Yes, sir. 12 THE COURT: Good morning. Good morning, ladies and 13 gentlemen. I was informed by the clerk that you all needed to 14 know the procedure for asking questions, and if you have 15 questions, it's all right. 16 I think the best way to do this is for you to write 17 your question out and then send it up to Mr. Neal, and he'll 18 give it to me, because there's some kind of questions that, 19 perhaps, are better -- I will tell you immediately, I can't 20 answer that or we can't get into that. 21 Others -- and I found this to be the case most of the 22 time. Other questions are very helpful to the lawyers to have, 23 because if you have -- you are the ones who have to decide the 24 case, and if you have a question, they need to know it and need 25 to work out a way to get the information to you through their</p>
<p>742</p> <p>1 APPEARANCES: (cont'g) 2 Dabney J. Carr, IV, Esquire 3 Troutman Sanders, LLP 4 Troutman Sanders Building 5 1001 Haxall Point 6 Richmond, Virginia 23219 7 Daniel W. McDonald, Esquire 8 Kirstin L. Stoll-DeBell, Esquire 9 William D. Schultz, Esquire 10 Merchant & Gould, PC 11 80 South Eighth Street 12 Suite 3200 13 Minneapolis, Minnesota 55402 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>744</p> <p>1 questions. 2 So if you feel like you have a question, you can 3 write them out, send them to me, and I'll take them and look at 4 them. Unless it's something that I can't allow, we'll work out 5 a way to get you the information that you need. 6 You all look like you're not as drained as you were 7 when you left yesterday afternoon. I feel the same way, so 8 let's get a fresh start. Let's go ahead, Mr. Robertson. 9 MR. ROBERTSON: Thank you, Your Honor. Good morning. 10 11 ALFRED C. WEAVER, 12 a witness, called by the plaintiff, having been previously 13 duly sworn, testified as follows: 14 DIRECT EXAMINATION 15 BY MR. ROBERTSON: (resuming) 16 Q Good morning, Dr. Weaver. 17 A Good morning, Mr. Robertson. 18 Q I'd like to start out looking at Plaintiff's Exhibit 19 Number 219, if I could, sir, in binder number five. Before we 20 get there, I have a few preliminary questions. 21 Do you know whether or not Lawson provides services to its 22 customers to assist them in importing vendor catalog data into 23 its item master? 24 A Yes, I do. There was witness testimony to that from the 25 customers.</p>

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<p>781</p> <p>1 another one. We just saw that in the Punchout. You can also</p> <p>2 do that with the internal catalogs, and you can search by</p> <p>3 keywords like Dell, or you can search by categories like we did</p> <p>4 as we marched through the UNSPSC codes.</p> <p>5 Q So does Lawson also indirectly infringe that by</p> <p>6 encouraging its customers to do the same?</p> <p>7 A Yes.</p> <p>8 Q Do you have an opinion as to whether or not Lawson systems</p> <p>9 include a means for searching for matching items among the</p> <p>10 selected product catalogs?</p> <p>11 A Yes, they do, and we saw that when I used the search</p> <p>12 engine.</p> <p>13 Q And did they indirectly infringe that claim element by</p> <p>14 assisting their customers to do the same?</p> <p>15 A Yes.</p> <p>16 Q The search engine you talked about, you also gave some</p> <p>17 evidence with respect to the search index; is that right?</p> <p>18 A That's right.</p> <p>19 Q We'll come back to that later in the context of some of</p> <p>20 the other claims. The search engine, though, just to refresh</p> <p>21 the jury was for what purpose?</p> <p>22 A This is to find the matching items.</p> <p>23 Q Do you have an opinion as to whether or not Lawson accused</p> <p>24 systems include means for building a requisition using data</p> <p>25 relating to selected matching items and their associated</p>	<p>783</p> <p>1 Q Do you have an opinion, Doctor, as to whether or not the</p> <p>2 accused Lawson systems satisfied the claim element means for</p> <p>3 converting data relating to a selected matching item and an</p> <p>4 associated source to data relating to an item in a different</p> <p>5 source?</p> <p>6 A Yes, and we saw that when we did the category search using</p> <p>7 the UNSPSC codes. And we also know this is made possible by</p> <p>8 that IC 516 program that loads UNSPSC codes into the item</p> <p>9 master.</p> <p>10 Q And this capability, is that provided to their customers?</p> <p>11 A Yes.</p> <p>12 Q And that is in the core IC module you mentioned?</p> <p>13 A Yes.</p> <p>14 Q And were there any demonstrations you put on for the jury</p> <p>15 to show how you could use that UNSPSC classification code to</p> <p>16 find generally equivalent items?</p> <p>17 A Yes. We just did that with the halogen lamps.</p> <p>18 Q So what is your opinion now -- I'm sorry. Did we see any</p> <p>19 evidence with respect to whether or not Lawson encourages or</p> <p>20 urges its customers to use the Lawson system to perform that</p> <p>21 cross-referencing capability or conversion capability?</p> <p>22 A Yes. We saw that in the training documents.</p> <p>23 Q The Judge has defined converting data related to a</p> <p>24 selected matching item and an associated source to an item in a</p> <p>25 different source. Do you see that?</p>
<p>782</p> <p>1 sources?</p> <p>2 A They do. We saw that in my, three of my demos and in</p> <p>3 their documentation.</p> <p>4 Q The Court defined matching items as search results. Is</p> <p>5 that consistent with your opinion?</p> <p>6 A Yes, it is.</p> <p>7 Q Does Lawson encourage its customers to directly infringe</p> <p>8 that claim by using the systems?</p> <p>9 A They do, and we had that list of evidence like training</p> <p>10 courses and help sites and Lawson employees going to the</p> <p>11 customer site to help them build or maintain their system.</p> <p>12 Q Do you have an opinion as to whether or not the accused</p> <p>13 Lawson systems have a capability of processing the requisition</p> <p>14 to generate one or more purchase orders for the selected</p> <p>15 matching items?</p> <p>16 A Yes. We saw that in my demo and in the system</p> <p>17 documentation.</p> <p>18 Q The Judge has defined selected matching items as</p> <p>19 requisition items. Is that -- is your opinion consistent with</p> <p>20 that?</p> <p>21 A Yes, it is.</p> <p>22 Q Does Lawson indirectly infringe -- meet this claim element</p> <p>23 by encouraging its customers to do the same by providing them</p> <p>24 with these systems?</p> <p>25 A Yes.</p>	<p>784</p> <p>1 A Yes. That's the second one on the glossary.</p> <p>2 Q Can you read for me what the Judge's definition is?</p> <p>3 A Substituting data related to a selected matching item and</p> <p>4 an associated source to data relating to an item and a</p> <p>5 different source.</p> <p>6 Q And in your opinion, does the Lawson system satisfy the</p> <p>7 Judge's definition of that claim element?</p> <p>8 A It does, and we just saw that with the halogen lamp from</p> <p>9 Granger and substituting the halogen lamp from Gexpro.</p> <p>10 Q So, Doctor, what is your opinion with respect to whether</p> <p>11 Lawson infringes claim three both directly and indirectly?</p> <p>12 A I believe they do.</p> <p>13 Q Next claim at issue here, which is the claim 26, this is</p> <p>14 the method comprising those steps. Again, the direct</p> <p>15 infringement here, or the accused direct infringement here for</p> <p>16 performing this method step is the customers performing these</p> <p>17 steps by using the Lawson system. Do you understand that?</p> <p>18 A I do.</p> <p>19 Q And you also mentioned this instance where Lawson may host</p> <p>20 a system for customers to use at the Lawson site. Do you see</p> <p>21 that?</p> <p>22 A Yes.</p> <p>23 Q So I want to go through this relatively quickly in the</p> <p>24 sense that these claim elements match up to the system claims</p> <p>25 that we just went through with the exception that we have this</p>

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<p>990</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF VIRGINIA 3 RICHMOND DIVISION 4 5 ----- 6 ePLUS, INC. : Civil Action No. 7 : 3:09CV620 8 vs. : 9 : 10 : 11 : 12 : 13 : 14 : 15 : 16 : 17 : 18 : 19 : 20 : 21 : 22 : 23 : 24 : 25 : COMPLETE TRANSCRIPT OF THE JURY TRIAL BEFORE THE HONORABLE ROBERT E. PAYNE UNITED STATES DISTRICT JUDGE, AND A JURY APPEARANCES: Scott L. Robertson, Esquire Michael G. Strapp, Esquire Jennifer A. Albert, Esquire David M. Young, Esquire Goodwin Procter, LLP 901 New York Avenue NW Suite 900 Washington, D.C. 20001 Craig T. Merritt, Esquire Christian & Barton, LLP 909 East Main Street Suite 1200 Richmond, Virginia 23219-3095 Counsel for the plaintiff Peppy Peterson, RPR Official Court Reporter United States District Court</p>	<p>992</p> <p>1 PROCEEDINGS 2 3 THE CLERK: Civil action number 3:09CV00620, ePlus, 4 Incorporated versus Lawson Software, Incorporated. Mr. Scott 5 L. Robertson, Mr. Craig T. Merritt, Ms. Jennifer A. Albert, Mr. 6 Michael G. Strapp, and Mr. David Young represent the plaintiff. 7 Mr. Daniel W. McDonald, Mr. Dabney J. Carr, IV, Ms. 8 Kirstin L. Stoll-DeBell, and Mr. William D. Schultz represent 9 the defendant. Are counsel ready to proceed? 10 MR. ROBERTSON: Plaintiff is, Your Honor. 11 MR. McDONALD: Yes, we are, Your Honor. 12 THE COURT: What did you all need to talk about? 13 MS. STOLL-DeBELL: We actually resolved it, Your 14 Honor, between the time we that mentioned -- 15 THE COURT: Tell them to bring the jury in. What do 16 we have this morning? 17 MR. ROBERTSON: The first witness we're calling this 18 morning is Mr. Keith Lohkamp, Your Honor. He's a Lawson 19 employee. I have a number of binders associated with the 20 witnesses this morning. I want to make sure my paralegal -- 21 oh. 22 23 (Jury in.) 24 25 THE COURT: Good morning, ladies and gentlemen. All</p>
<p>991</p> <p>1 APPEARANCES: (cont'g) 2 Dabney J. Carr, IV, Esquire 3 Troutman Sanders, LLP 4 Troutman Sanders Building 5 1001 Haxall Point 6 Richmond, Virginia 23219 7 Daniel W. McDonald, Esquire 8 Kirstin L. Stoll-DeBell, Esquire 9 William D. Schultz, Esquire 10 Merchant & Gould, PC 11 80 South Eighth Street 12 Suite 3200 13 Minneapolis, Minnesota 55402 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>993</p> <p>1 right, we have a witness. Next witness. 2 MR. ROBERTSON: Mr. Keith Lohkamp. 3 THE COURT: All right, Keith Lohkamp. 4 5 KEITH LOHKAMP, 6 a witness, called by the plaintiff, having been first duly 7 sworn, testified as follows: 8 DIRECT EXAMINATION 9 BY MR. ROBERTSON: 10 Q Good morning, Mr. Lohkamp. 11 A Good morning. 12 Q Mr. Lohkamp, you are a Lawson Software employee; correct? 13 A Yes, I am. 14 Q And you are a product strategist for supply chain 15 management; correct? 16 A Yes. 17 THE COURT: Can we get the witness to spell his last. 18 Q Can you please spell your last name, sir, for the record. 19 A It's L-o-h-k-a-m-p. 20 Q Can you explain to the jury essentially what supply chain 21 management is? 22 A Supply chain management involves the procurement of goods 23 and services and the management of the inventory related to 24 managing those goods. It also includes, can include the sell 25 side, so selling those goods and services as well.</p>

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<p style="text-align: right;">1154</p> <p>Lohkamp - Redirect 1154</p> <p>1 Dale Christopherson.</p> <p>2 THE COURT: How long is this going to take?</p> <p>3 MR. ROBERTSON: Your Honor, I'm trying to cut it back</p> <p>4 considerably. I think I'd be less than 45 minutes.</p> <p>5 THE COURT: Mr. Niemeyer, how long is his examination</p> <p>6 going to be?</p> <p>7 MR. ROBERTSON: Less than an hour.</p> <p>8 THE COURT: Let's go. There was a lot of stuff that</p> <p>9 that could have been excised from that.</p> <p>10 MR. ROBERTSON: I tried to limit it, Your Honor, but</p> <p>11 both parties get to cross-designate, so...</p> <p>12 THE COURT: 611 is in effect in full force.</p> <p>13</p> <p>14 DALE CHRISTOPHERSON,</p> <p>15 a witness, called by the plaintiff, having been first duly</p> <p>16 sworn, testified as follows:</p> <p>17</p> <p>18 MR. ROBERTSON: May I proceed, Your Honor?</p> <p>19 THE COURT: Please.</p> <p>20</p> <p>21 DIRECT EXAMINATION</p> <p>22 BY MR. ROBERTSON:</p> <p>23 Q Will you state your full name for the record, sir?</p> <p>24 A Dale Arnold Christopherson.</p> <p>25 Q And you are currently the director of development at</p>	<p style="text-align: right;">1156</p> <p>1 nine plus you have to do that; isn't that right?</p> <p>2 A In nine plus?</p> <p>3 Q Any version nine and above?</p> <p>4 A Oh, any version nine and above, that's correct.</p> <p>5 Q There are several versions of this software we've been</p> <p>6 talking about; correct?</p> <p>7 A Yes, there are.</p> <p>8 Q And there's a separate license fee associated with Lawson</p> <p>9 system foundation; is that correct?</p> <p>10 A That's correct.</p> <p>11 Q Now, there's been a lot of discussion about these vendor</p> <p>12 catalogs. A customer can import a vendor catalog into the item</p> <p>13 master of the Lawson system; isn't that right?</p> <p>14 A They can go basically through a three-step process, yes.</p> <p>15 Q And you are aware also of this UNSPSC we've been talking</p> <p>16 about?</p> <p>17 A I certainly am.</p> <p>18 Q So isn't it true that you can use the UNSPSC to find items</p> <p>19 from different vendors that were all cross-referenced using the</p> <p>20 same product category?</p> <p>21 A Let me think about what you are really saying there.</p> <p>22 Could you restate that?</p> <p>23 Q Sure. Isn't it true that a user of the Lawson system that</p> <p>24 has this UNSPSC capability can find items from different</p> <p>25 vendors that were all cross-referenced to the same product</p>
<p style="text-align: right;">1155</p> <p>1 Lawson Software; correct?</p> <p>2 A That's correct.</p> <p>3 Q Then in your role as the director of development, you have</p> <p>4 responsibilities for these software modules that we've been</p> <p>5 talking about, Lawson requisition self-service, Lawson</p> <p>6 procurement punchout, Lawson purchase order, Lawson</p> <p>7 requisitions, Lawson inventory control, and Lawson EDI;</p> <p>8 correct?</p> <p>9 A Those are some of the many that I do have under my</p> <p>10 control, yes.</p> <p>11 Q You are familiar also with the Lawson system foundation;</p> <p>12 is that right?</p> <p>13 A Depends on how deep you want to go into it, but, yes, I am</p> <p>14 familiar with it at some length.</p> <p>15 Q You were asked in your deposition whether Lawson system</p> <p>16 foundation is a technology layer that sits below these current</p> <p>17 applications we've been talking about. Do you recall that?</p> <p>18 A I certainly do.</p> <p>19 Q You said it was?</p> <p>20 A Yes, it was and still is.</p> <p>21 Q And so isn't it true now that all customers of Lawson are</p> <p>22 required to license the Lawson system foundation in order to</p> <p>23 use the current version of the Lawson applications?</p> <p>24 A That's correct.</p> <p>25 Q And in this procurement version nine plus, any version</p>	<p style="text-align: right;">1157</p> <p>1 category?</p> <p>2 A That's correct, yes.</p> <p>3 Q The shopping cart in Lawson requisition self-service can</p> <p>4 be dynamically built from results of conducting searches in the</p> <p>5 item master; isn't that right?</p> <p>6 A That is correct.</p> <p>7 Q And it's also true that the shopping cart can also be</p> <p>8 dynamically built using the results of searches in the vendor</p> <p>9 punchout catalogs; right?</p> <p>10 A That is also correct.</p> <p>11 Q And when the user clicks a checkout in the items in your</p> <p>12 shopping cart, they are moved into the requisition system, and</p> <p>13 an actual requisition is created; isn't that right?</p> <p>14 A I would actually define that slightly different.</p> <p>15 Q All right. Do you recall giving a deposition in this</p> <p>16 case?</p> <p>17 A I certainly do.</p> <p>18 Q And you were under oath?</p> <p>19 A Uh-huh.</p> <p>20 Q I believe you have your deposition transcript. It should</p> <p>21 be in the first volume.</p> <p>22 A Yep.</p> <p>23 Q Could you go to page 77? Excuse me. I misspoke. 177.</p> <p>24 A 177?</p> <p>25 Q Yes, sir.</p>

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<p>1158</p> <p>1 A Okay. I'm not there yet.</p> <p>2 Q Okay, take your time.</p> <p>3 A Okay, 177.</p> <p>4 Q Starting at about line 18?</p> <p>5 A Starting with question, and then on the right-hand screen?</p> <p>6 Q Let me read the question for you.</p> <p>7 Question: And then on the right-hand screen in the card,</p> <p>8 here you have four items that have been included in your</p> <p>9 shopping cart. What happens to that when you click checkout?</p> <p>10 Your answer: When you click checkout, then it would move</p> <p>11 that information into the requisition system and actually</p> <p>12 create a requisition.</p> <p>13 Did you give that answer to that question at that time?</p> <p>14 A I certainly did.</p> <p>15 Q Okay. Thank you. Once a requisition is approved, the</p> <p>16 requisition is released and then transferred to the purchase</p> <p>17 order system; correct?</p> <p>18 A That's correct, after it's been approved.</p> <p>19 Q Talking just now about procurement punchout, when users</p> <p>20 have filled their shopping carts, virtually speaking, and</p> <p>21 checked out from the vendor website using the Lawson</p> <p>22 procurement punchout, the chosen items and their prices are</p> <p>23 returned to the Lawson server and a requisition is created</p> <p>24 using the Lawson requisition self-service application; correct?</p> <p>25 A Can you state that again? The second half of it basically</p>	<p>1160</p> <p>1 multi-vendor catalog capability is a punchout trading partner</p> <p>2 of Lawson; correct?</p> <p>3 A That's correct. They are on the list, yes.</p> <p>4 Q It's an accurate statement to say that if Lawson could not</p> <p>5 market a requisition module, it could not effectively compete</p> <p>6 in the supply chain management product market?</p> <p>7 A I would say that that would be an accurate statement, yes.</p> <p>8 Q It's also accurate to say if Lawson could not offer a</p> <p>9 purchase order module, Lawson could not effectively compete in</p> <p>10 the supply chain management product market?</p> <p>11 A That would also be correct.</p> <p>12 Q You've heard a lot of talk about the implementation and</p> <p>13 installation services that Lawson offers. I just want to be</p> <p>14 clear that Lawson will provide implementation services to</p> <p>15 assist its customers with importing vendor catalog data into</p> <p>16 the item master.</p> <p>17 A I didn't hear a question in that, sir.</p> <p>18 Q Let me restate it then. Perhaps I misspoke. Is it true</p> <p>19 that Lawson provides implementation services to assist its</p> <p>20 customers with importing vendor catalog data into the item</p> <p>21 master?</p> <p>22 A If the customer so chooses and wants that service, yes, we</p> <p>23 do.</p> <p>24 Q So for most situations where a customer licenses the</p> <p>25 supply chain management suite or the procurement modules we've</p>
<p>1159</p> <p>1 is where I lost you. ^ you check out at the customer, not the</p> <p>2 customer but the vendor site and then it was at that point</p> <p>3 where I got lost.</p> <p>4 Q Let me start over. Let's hear the whole question. When</p> <p>5 users have filled their shopping carts, virtually speaking, and</p> <p>6 checked out from the vendor website using Lawson procurement</p> <p>7 punchout, the chosen items and their price are then returned to</p> <p>8 the Lawson server, and a requisition is created using the</p> <p>9 Lawson requisition self-service application; correct?</p> <p>10 A That's correct.</p> <p>11 Q Isn't it true that the current version of the Lawson</p> <p>12 procurement punchout includes the capability to punch out to</p> <p>13 multi-vendor catalogs?</p> <p>14 A That's correct.</p> <p>15 Q One of those examples of a site that you can go that is a</p> <p>16 multi-catalog vendor -- excuse me, multi-vendor catalog, is</p> <p>17 SciQuest; correct?</p> <p>18 A That's correct.</p> <p>19 Q Another example of a multi-vendor catalog site that's</p> <p>20 available for the punchout procurement is an organization known</p> <p>21 as GHX; correct?</p> <p>22 A That is correct.</p> <p>23 Q That stands for Global Healthcare Exchange?</p> <p>24 A That's correct.</p> <p>25 Q And Global Healthcare Exchange that provides this</p>	<p>1161</p> <p>1 been talking about in supply chain management, Lawson</p> <p>2 professional services is going to provide the actual</p> <p>3 installation and implementation services for that system;</p> <p>4 correct?</p> <p>5 A That's correct, yes.</p> <p>6 Q All existing Lawson customers today are under maintenance</p> <p>7 contracts with Lawson; correct?</p> <p>8 A That's correct.</p> <p>9 Q So all of the supply chain -- excuse me. All of the</p> <p>10 supply -- let me restate that. All of the S3 procurement</p> <p>11 products that are under contract today with Lawson customers,</p> <p>12 they have maintenance contracts; is that right?</p> <p>13 A Could you restate that?</p> <p>14 Q Yeah. I'm sorry. It was a bad question. With respect to</p> <p>15 the Lawson S3 procurement product that's at issue here, any</p> <p>16 customer that has that product is under an existing maintenance</p> <p>17 contract?</p> <p>18 A That's correct.</p> <p>19 Q There's been a lot of talk about this RFP process, and I</p> <p>20 don't want to go through it again in detail, certainly, but</p> <p>21 there is a standard set of answers for those common questions</p> <p>22 that customers have about the S3 procurement product; correct?</p> <p>23 A That is correct, yes.</p> <p>24 Q I think if you'll look in your book to Exhibit 117.</p> <p>25 A Okay.</p>

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<p>1188</p> <p>1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE EASTERN DISTRICT OF VIRGINIA 3 RICHMOND DIVISION 4 5 ----- 6 ePLUS, INC. : Civil Action No. : 3:09CV620 7 vs. : : 8 LAWSON SOFTWARE, INC. : January 12, 2011 : 9 ----- 10 11 COMPLETE TRANSCRIPT OF THE JURY TRIAL 12 BEFORE THE HONORABLE ROBERT E. PAYNE 13 UNITED STATES DISTRICT JUDGE, AND A JURY 14 15 APPEARANCES: 16 Scott L. Robertson, Esquire 17 Michael G. Strapp, Esquire 18 Jennifer A. Albert, Esquire 19 David M. Young, Esquire 20 Goodwin Procter, LLP 21 901 New York Avenue NW 22 Suite 900 23 Washington, D.C. 20001 24 Craig T. Merritt, Esquire 25 Christian & Barton, LLP 909 East Main Street Suite 1200 Richmond, Virginia 23219-3095 Counsel for the plaintiff Peppy Peterson, RPR Official Court Reporter United States District Court</p>	<p>1190</p> <p>1 P R O C E E D I N G S 2 3 THE CLERK: Civil action number 3:09CV00620, ePlus, 4 Incorporated, versus Lawson Software, Incorporated. Mr. Scott 5 L. Robertson, Mr. Craig T. Merritt, Ms. Jennifer A. Albert, Mr. 6 Michael G. Strapp represent the plaintiff. 7 Mr. Daniel W. McDonald, Mr. Dabney J. Carr, IV, Ms. 8 Kirstin L. Stoll-DeBell, and Mr. William D. Schultz represent 9 the defendant. Are counsel ready to proceed? 10 MR. ROBERTSON: Plaintiff is, Your Honor. 11 MR. McDONALD: Yes, Your Honor. 12 THE COURT: All right. You said you wanted to see me 13 before the jury comes in. 14 MR. McDONALD: Yeah, there's basically three issues 15 we wanted to raise. 16 THE COURT: The court reporters always can hear 17 better if you come to the lectern. 18 MR. McDONALD: There's basically three issues that we 19 wanted to raise this morning. One is our third witness in our 20 case that we start today is Ms. Raleigh. 21 THE COURT: Third witness in what? 22 MR. McDONALD: In our case when we start presenting 23 our case today. We have Mr. Richard Lawson first, Mr. 24 Christopherson second, and then Hannah Raleigh was supposed to 25 come back and be third today.</p>
<p>1189</p> <p>1189</p> <p>1 APPEARANCES: (cont'g) 2 Dabney J. Carr, IV, Esquire 3 Troutman Sanders, LLP 4 Troutman Sanders Building 5 1001 Haxall Point 6 Richmond, Virginia 23219 7 Daniel W. McDonald, Esquire 8 Kirstin L. Stoll-DeBell, Esquire 9 William D. Schultz, Esquire 10 Merchant & Gould, PC 11 80 South Eighth Street 12 Suite 3200 13 Minneapolis, Minnesota 55402 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>1191</p> <p>1191</p> <p>1 She was supposed to be back last night from New York, 2 and New York is getting hammered real bad by this blizzard. 3 She's trying to get another flight, but her flight is not going 4 to get her here until after the trial day is over today. So 5 we've been trying to work something out with ePlus about what 6 we would do next because we haven't disclosed any exhibits or 7 anything for the next witness. 8 THE COURT: Just call the next witness, the expert or 9 whoever you've got here. There's no magic to the order of 10 putting people on. 11 MR. McDONALD: The next witness we would have 12 actually here is Mr. Lohkamp, calling him back. 13 THE COURT: Good. 14 MR. McDONALD: That's fine. They haven't had a 15 chance to get ready for their cross-examination. 16 THE COURT: They'll be ready. They knew basically 17 what you were going to do anyway. They're not going to do it 18 on your cross-examination; they were going to do redirect, so 19 we're going to reverse things. 20 MR. McDONALD: We do have a deposition of Ms. 21 O'Loughlin on the RIMS prior art issue that we can move up in 22 the order. 23 THE COURT: Is that carefully edited to eliminate the 24 trash? 25 MR. McDONALD: That's being worked on as we speak,</p>

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<p>1244</p> <p>1 and placed into the keyword detail table. For each item, there</p> <p>2 is a corresponding keyword and an origin field.</p> <p>3 Q And what database tables are indexed by the keyword detail</p> <p>4 table?</p> <p>5 A My understanding is that at minimum, the ITEMMAST,</p> <p>6 POITEMVEN, and ITEMLOC tables.</p> <p>7 Q In the context of this source code, what is the purpose of</p> <p>8 having an index like the keyword detail table?</p> <p>9 A It's common practice to create an index to -- an</p> <p>10 optimization to increase the speed of the search and to</p> <p>11 eliminate to need to search the whole collection of data when</p> <p>12 you can condense it to an index that you can search more</p> <p>13 rapidly.</p> <p>14 Q Can you explain how the item vendor table or the POITEMVEN</p> <p>15 table is used in the implementation of a keyword search in the</p> <p>16 source code?</p> <p>17 A After the search is performed against the keyword tables</p> <p>18 and item information is being retrieved, corresponding vendor</p> <p>19 information for the items is retrieved from the POITEMVEN</p> <p>20 table.</p> <p>21 Q Do the records in the item vendor or POITEMVEN table link</p> <p>22 in any way to the records in the item master or ITEMMAST table?</p> <p>23 A Yes, they do. They contain a field which holds the item</p> <p>24 number for a given item in the ITEMMAST table.</p> <p>25 Q Have you prepared a demonstrative to help you explain how</p>	<p>1246</p> <p>1 browser and hits the search button, the search term is conveyed</p> <p>2 as part of a request to the server side components which causes</p> <p>3 the Lawson 4GL COBOL program called RQIC to be executed. The</p> <p>4 RQIC program ultimately performs a search of the keyword detail</p> <p>5 table for occurrences of that term that have been previously</p> <p>6 indexed.</p> <p>7 Any matching records from the keyword detail table are</p> <p>8 then used to find the corresponding items in the ITEMMAST table</p> <p>9 and data gets gathered from the PO and ITEMLOC tables. All of</p> <p>10 those results are formatted as XML and ultimately returned to</p> <p>11 the item web browser and formatted as a search word.</p> <p>12 Q When the search code searches the keyword tables to locate</p> <p>13 the keywords that the user typed in, does the source code</p> <p>14 search the item master table at all?</p> <p>15 A No, it does not. It only searches the keyword detail</p> <p>16 table and the associated keyword tables.</p> <p>17 Q Now, I'd like to turn to the functionality for the adding</p> <p>18 items to a shopping cart and building a requisition. Does the</p> <p>19 source code of the Lawson system implement functionality that</p> <p>20 allows a user to select desired items for requisition from a</p> <p>21 list of results returned from either this category or keyword</p> <p>22 search that you discussed?</p> <p>23 A Yes, it implements a shopping cart functionality whereby</p> <p>24 the user can indicate that an item from a search result should</p> <p>25 be added to the shopping cart. Items can be added and removed</p>
<p>1245</p> <p>1 the information in these two tables can be related?</p> <p>2 A Yes, I have.</p> <p>3 MS. ALBERT: Mike, can we have slide 68, please.</p> <p>4 Q Is this the demonstrative that you prepared?</p> <p>5 A Yes, it is.</p> <p>6 Q Now, using your demonstrative, would you please explain</p> <p>7 how records in the item vendor or POITEMVEN table can be</p> <p>8 related to records in the item master table or ITEMMAST table?</p> <p>9 A Yes. So within the ITEMMAST table, or the item master</p> <p>10 table, there is a field called IITEM which holds the item</p> <p>11 number for that item. That item number uniquely identifies the</p> <p>12 item within the ITEMMAST table.</p> <p>13 The PO item vendor table then can -- given record within</p> <p>14 that table can refer to an item within the ITEMMAST table using</p> <p>15 that unique number. It's what's known as a key field in the</p> <p>16 ITEMMAST table. Within the POITEMVEN table, there's a field</p> <p>17 called PIV item which holds that number, and, therefore, if you</p> <p>18 want to, for a given item in the POITEMVEN table, you can point</p> <p>19 back to a specific unique item within the ITEMMAST.</p> <p>20 MS. ALBERT: Mike, could we go back to slide 24,</p> <p>21 please.</p> <p>22 Q Now, going back to your demonstrative on keyword search</p> <p>23 query execution, can you explain how the keyword search</p> <p>24 functionality is implemented in the Lawson system source code?</p> <p>25 A Yes. So after the user enters a search term in the</p>	<p>1247</p> <p>1 until checkout operation is performed. Similar to the way you</p> <p>2 shop on Amazon or another web business.</p> <p>3 Q Now, what, if any, database tables are involved in this</p> <p>4 shopping cart functionality?</p> <p>5 A There are three. Two of them are prefixed with the term</p> <p>6 REQ. One is called REQHEADER and the other is called REQLINE.</p> <p>7 The third is called PO interface which we mentioned before,</p> <p>8 POITERFAC.</p> <p>9 Q And what information is stored in that REQLINE table</p> <p>10 that's relevant to the shopping cart functionality?</p> <p>11 A The REQLINE table holds the individual line items</p> <p>12 representing items that were selected to be added to the</p> <p>13 shopping cart.</p> <p>14 Q Does this REQLINE table also contain a status field?</p> <p>15 A Yes, it does. In addition to the item information, it</p> <p>16 contains a status which can indicate that the item is either --</p> <p>17 while in the shopping cart, it's in a state called unreleased.</p> <p>18 Q What does that mean?</p> <p>19 A It means that it is part of a shopping cart and not yet</p> <p>20 part of a requisition.</p> <p>21 Q And is there another status that can be indicated in this</p> <p>22 status field in addition to the unreleased status that you</p> <p>23 mentioned?</p> <p>24 A Yes. So I'd just say both the REQLINE and REQHEADER table</p> <p>25 that I mentioned which are involved in this contain a status</p>

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<p>1248</p> <p>1 field which indicates the disposition of the information,</p> <p>2 whether it's part of the shopping cart or whether it's part of</p> <p>3 requisition, that the two values can be what's called</p> <p>4 unreleased or released.</p> <p>5 It indicates it's either in a status of unreleased or</p> <p>6 released where unreleased is the status used while the items</p> <p>7 are in the shopping cart, and released is -- indicates that</p> <p>8 they are now part of the requisition.</p> <p>9 Q What information is stored in that REQHEADER table that's</p> <p>10 relevant to the shopping cart function?</p> <p>11 A The REQHEADER table represents the shopping cart as a</p> <p>12 whole in this case, and it groups the REQLINE records together.</p> <p>13 Q Can you explain how this shopping cart functionality is</p> <p>14 implemented in the source code?</p> <p>15 A Yes. So as the user indicates that they would like to add</p> <p>16 an item to the shopping cart, when the user indicates the item</p> <p>17 should be added to the shopping cart, the item number for that</p> <p>18 item is conveyed as part of a request to the server side at</p> <p>19 which point a Lawson 4GL COBOL program is executed to add a</p> <p>20 line to the REQLINE, add a record to the REQLINE table</p> <p>21 corresponding to that item.</p> <p>22 Q Have you created some demonstrative to show what happens</p> <p>23 in the source code when the user clicks on the checkout button</p> <p>24 after he has added items to the shopping cart?</p> <p>25 A Yes, there should be two.</p>	<p>1250</p> <p>1 4GL COBOL program called RQIF, or release requisition, is</p> <p>2 invoked.</p> <p>3 Its first job is to update the status that I mentioned</p> <p>4 before in both the REQHEADER and REQLINE tables from an</p> <p>5 unreleased to a released value. The second step is to create</p> <p>6 records in the PO interface table, POINTINTERFAC table, which make</p> <p>7 those records, make that information then available to the</p> <p>8 purchase order system.</p> <p>9 Q Are records created in this PO interface table at the time</p> <p>10 when items are initially added to the shopping cart?</p> <p>11 A No. They are only created after the checkout operation is</p> <p>12 performed.</p> <p>13 Q Are the records in the REQHEADER and REQLINE tables</p> <p>14 available to the purchase order system prior to that checkout</p> <p>15 button being pressed?</p> <p>16 A No, they are made available by virtue of the records in</p> <p>17 the PO interface table.</p> <p>18 Q Now I'd like to turn to the process for generating a</p> <p>19 purchase order. Does a source code of the Lawson system</p> <p>20 implement functionality that generates one or more purchase</p> <p>21 orders corresponding to the items listed in a requisition built</p> <p>22 using the Lawson system?</p> <p>23 A Yes, it does. The user can use a program called PO 100 to</p> <p>24 generate one or more purchase orders from a requisition.</p> <p>25 Q Does the source code indicate anything about when multiple</p>
<p>1249</p> <p>1 MS. ALBERT: Mike, can we go first to slide 25,</p> <p>2 please.</p> <p>3 Q Now, using these demonstratives, would you please explain</p> <p>4 what happens in the source code when the user clicks on that</p> <p>5 checkout button after he's added items to the shopping cart?</p> <p>6 A So when a user clicks on the checkout button, there's two</p> <p>7 major -- two phases that happen, and this depicts the first.</p> <p>8 If at this point a requisition header, REQHEADER record</p> <p>9 has not previously been created, one will be created at this</p> <p>10 time. This happens when a request is made from the client's</p> <p>11 web browser to the server side causing the Lawson COBOL program</p> <p>12 RQIB, or create requisition header which is shown here, to be</p> <p>13 executed. That program adds a record to the REQHEADER table.</p> <p>14 Q What is a requisition header?</p> <p>15 A Again, in this case, it represents either the shopping</p> <p>16 cart as a whole or the requisition as a whole. It serves to</p> <p>17 group the requisition lines and to contain a status for the</p> <p>18 overall shopping cart or requisition.</p> <p>19 MS. ALBERT: Mike, can we go to slide 26, please.</p> <p>20 Q So now can you explain what happens in the source code in</p> <p>21 the next step in this process?</p> <p>22 A In this step, there are two activities of importance.</p> <p>23 This, again, is happening after the user has clicked the</p> <p>24 checkout button. Request is -- second request is made from the</p> <p>25 client's browser to the server side. In this case, the Lawson</p>	<p>1251</p> <p>1 purchase orders would be created from line items in a single</p> <p>2 requisition?</p> <p>3 A Yes. As part of the purchase order generation process,</p> <p>4 the requisition items are essentially sorted in order to</p> <p>5 produce a separate purchase order for each vendor corresponding</p> <p>6 to items in the requisition.</p> <p>7 Q Have you prepared a demonstrative to explain how this</p> <p>8 functionality is implemented in the source code?</p> <p>9 A Yes, I have.</p> <p>10 MS. ALBERT: Mike, could we have slide 27, please.</p> <p>11 Q Now, what, if any, database tables are involved in this</p> <p>12 purchase order functionality?</p> <p>13 A There are three depicted here. The first is the PO</p> <p>14 interface table which I mentioned previously. The two new</p> <p>15 tables are -- one is called PURCHORDER, short for purchase</p> <p>16 order, P-U-R-C-H-O-R-D-E-R, and the second is POLINE,</p> <p>17 P-O-L-I-N-E, short for purchase order line.</p> <p>18 Q What information is stored in the PO interface table</p> <p>19 that's relevant to the purchase order generation function?</p> <p>20 A Well, I mentioned before, this serves to make the</p> <p>21 requisition information available to the purchase order system.</p> <p>22 Q And what information does the PURCHORDER or purchase order</p> <p>23 table store that's relevant to the purchase order generation</p> <p>24 function?</p> <p>25 A A record in the PURCHORDER table represents a specific</p>